



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

(217) 524-6365

March 29, 2000

Mr. Kevin Adler
U.S. Environmental Protection Agency
77 West Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

Re: L0971900047 Lake Co.
Waukegan Coke Plant
Pilot Test Comments
Superfund/Technical Reports

Dear Mr. Adler:

The Illinois EPA has reviewed the February 28, 2000 Pilot Project Work Plan for the Waukegan Manufactured Gas and Coke Plant. Please find my comments attached.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script, reading "Gerald E. Willman".

Gerald E. Willman
Remedial Project Manager
National Priorities List Unit
Division of Remediation Management
Bureau of Land

Attachment

cc: Jerry Willman w/ attachment
Bureau File w/ attachment

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**Illinois Environmental Protection Agency Comments
February 28, 2000 Pilot Project Work Plan
Waukegan Manufactured Gas and Coke Plant**

- 1.) No information is provided with regard to expected influent and effluent concentrations. Illinois EPA understands that influent and effluent concentrations are an important part of what the pilot test will determine. However, this plan needs to include tables and discussion from the Feasibility Study to indicate what the *expected* influent and effluent levels will be. The concentrations of constituents regulated under the State Drinking Water Act (i.e MCLs), 35 Illinois Administrative Code Part 620, and the Resource Conservation and Recovery Act (RCRA) are important. The ROD stated that:

It is estimated that the arsenic influent will be 4.2 mg/l (below the 5 mg/l arsenic TCLP) and benzene will be 0.09 mg/l (below the 0.5 mg/l benzene TCLP). If it is determined that the influent levels are above regulatory criteria, the system would be designed to meet the substantive regulatory requirements.

The report needs to address how the system will be designed to meet RCRA standards if the influent is above the regulatory criteria. If the influent meets the definition of hazardous waste by characteristic, the requirements for tanks found in 35 Ill. Adm. Code 724, Subpart J would be considered applicable or relevant and appropriate.
- 2.) Regarding concentrations for treated groundwater for re-injection, Illinois EPA is aware that it will not be feasible to meet MCLs for all constituents. However the plan needs to establish that the treatment train that was selected for the pilot makes a reasonable effort to treat to levels nearing MCLs.
- 3.) Work performed under this pilot project should comply with the Illinois Water Well Construction Code (77 Ill. Adm. Code 920).
- 4.) **Page 7; Third line from bottom:** It appears that the word "effluence" is a typographical error.
- 5.) **Page 13; Item A:** Should arsenic be include within this section?